12521 Harbour Reach Drive Mukilteo, WA 98275 (425) 609-2500 www.travisindustries.com



Tuesday, September 28, 2021

Rafael Sanchez, Ph.D.
Wood Heater Program Lead
Air Branch
Monitoring, Assistance, and Media Programs Division
Office of Compliance
U.S. Environmental Protection Agency (EPA)
Room 7149-D
1200 Pennsylvania Ave., NW
MS:2227A
Washington, DC 20460

Dear Dr. Sanchez,

This is to request Travis Industries, Inc., be allowed to make certain design changes to our certified model line Evergreen, certificate #151-18.

The proposed design change consist of cosmetic changes, external to the firebox, and are detailed in the attached Equivalence report 0028WS119E.

The proposed changes were revived by Omni-Test Laboratories, and it was determined that the proposed changes would not cause the Evergreen model line to exceed the applicable emissions limits. Travis is requesting a potential waiver from certification testing.

Omni the third party certifier issued a revised Certificate of Conformity (Copy attached).

EPA has previously determined that changes of less than 5% of the cross-sectional area of air inlets and outlets, and changes of less than + or -  $\frac{1}{3}$ " firebox dimensions are presumed not to effect emissions.

EPA has also previously determined that the addition of outer shielding will not cause the model line to exceed the applicable emissions limit.

Travis Industries Inc,. Affirms that the proposed design changes will not cause the Evergreen model line to exceed the applicable emissions limits, and all wood heaters in this model line will continue to be similar in all material respects to the representative wood heater submitted for testing on which the original certificate of compliance was based.

Travis Industries, Inc. would like EPA to review this request and determine if the proposed design changes can be made without the need for re-certification and/or additional testing.

If EPA determines that the proposed changes can be made without the need for re-certification and/or the need for additional testing, we would like to add this new model to the "Certified Wood Heater" list under certificate 151-18 as the Evergreen Step Top and Evergreen Insert.

Please contact me if you have any questions, or require additional information.

Thank you,

Alan Atemboski

Vice Presidient R&D

Travis Industries, Inc.

a.atemboski@travis-inc.com

425-609-2563

www.travisproducts.com